

MAR 07 2001

CERTIFIED MAIL

Return Receipt Requested

Article No: Z 404 814 246

Mr. Scott Loven
Industrial Laminates/Norplex
665 Lybrand Street
Postville, IA 52162

Dear Mr. Loven:

RE: Industrial Laminates/Norplex
Postville, IA
EPA RCRA ID No. IAD073489288

Letter of Warning/Request for Information

On September 28, 2000, a representative of the U. S. Environmental Protection Agency (EPA) inspected your facility. This inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA).

My staff has reviewed the inspection report and your October 2, 2000 correspondence to EPA regarding violations identified as a result of the inspection. Based on our review of these documents, my staff has determined that violations of RCRA remain. Enclosed is a list of violations followed by a list of questions and/or requested information. Also enclosed are instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection.

Within thirty (30) calendar days of receiving this letter, please mail your response to: Kori Kuehl, ARTD/RESP, U. S. Environmental Protection Agency, 901 N. 5th Ave., Kansas City, Kansas 66101. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions concerning this letter to Kori, of my staff, at (913) 551-7154.

Sincerely,

Cecilia Tapia, Chief
RCRA Enforcement and State Program Branch
Air, RCRA, and Toxics Division

Enclosures 2

cc: Chief, Land Quality Bureau
Iowa Dept. of Natural Resources

bcc: Richard N. McKiddy, ENSV, w/list of violations



00181265

RCRA RECORDS CENTER

ARTD:RESP:JMA:7928:22FEB01:H:ARTD/RESP/KUEHL/INDUSTRIALLAMINATESLOW3007.WPD					
Branch	RESP	RESP	RESP		
Name	KUEHL	MITCHELL	TAPIA		
Initials	SAK	SM	CTapia		
Date	2/23/01	2/23/01	2/26/01		

Background

EPA representatives conducted an inspection at the Industrial Laminates/Norplex facility located at 665 Lybrand Street, Postville, IA (RCRA ID No. IAD073489288), on September 28, 2000. The purpose of the inspection was to determine the compliance status of the facility with respect to the regulatory requirements of the Resource Conservation and Recovery Act (RCRA) specified in Title 40 Code of Federal Regulations (40 CFR) Parts 260 through 270.

Violations Which Remain

1. 40 CFR 265.16(d)(1)- no documentation of the job title and name of person filling each position related to hazardous waste management.
2. 40 CFR 265.16(d)(3)- no documentation of the amount of both introductory and continuing training that will be given to each person in a position related to hazardous waste management.
3. 40 CFR 262.34(a)(2)- failure to have dates of accumulation marked on the drums of hazardous waste.

Information Requested

1. The regulation contained at 40 CFR 265.16(d)(1) states that the owner or operator must maintain the following documents and records at the facility: the job title for each position at the facility related to the hazardous waste management, and the name of the employee filling each job. Please provide a list of job titles and names of each employee filling such specific positions.
2. The regulation contained at 40 CFR 265.16(d)(3) states that the owner or operator must maintain the following documents and records at the facility: a written description of the amount of both introductory and continuing training that will be given to each person in a position related to hazardous waste management. Please provide a written description of the amount of both introductory and continuing training that will be given to each person in a position related to hazardous waste management.
3. The regulation contained at 40 CFR 262.34(a)(2) states that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. Please verify that you have marked all your drums with the accumulation date.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 07 2001

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

CERTIFIED MAIL

Return Receipt Requested

Article No: Z 404 814 246

Mr. Scott Loven
Industrial Laminates/Norplex
665 Lybrand Street
Postville, IA 52162

Dear Mr. Loven:

RE: Industrial Laminates/Norplex
Postville, IA
EPA RCRA ID No. IAD073489288

Letter of Warning/Request for Information

On September 28, 2000, a representative of the U. S. Environmental Protection Agency (EPA) inspected your facility. This inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA).

My staff has reviewed the inspection report and your October 2, 2000 correspondence to EPA regarding violations identified as a result of the inspection. Based on our review of these documents, my staff has determined that violations of RCRA remain. Enclosed is a list of violations followed by a list of questions and/or requested information. Also enclosed are instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection.

Within thirty (30) calendar days of receiving this letter, please mail your response to: Kori Kuehl, ARTD/RESP, U. S. Environmental Protection Agency, 901 N. 5th Ave., Kansas City, Kansas 66101. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions concerning this letter to Kori, of my staff, at (913) 551-7154.

Sincerely,

Cecilia Tapia, Chief

RCRA Enforcement and State Program Branch
Air, RCRA, and Toxics Division

Enclosures 2

cc: Chief, Land Quality Bureau
Iowa Dept. of Natural Resources

Background

EPA representatives conducted an inspection at the Industrial Laminates/Norplex facility located at 665 Lybrand Street, Postville, IA (RCRA ID No. IAD073489288), on September 28, 2000. The purpose of the inspection was to determine the compliance status of the facility with respect to the regulatory requirements of the Resource Conservation and Recovery Act (RCRA) specified in Title 40 Code of Federal Regulations (40 CFR) Parts 260 through 270.

Violations Which Remain

1. 40 CFR 265.16(d)(1)- no documentation of the job title and name of person filling each position related to hazardous waste management.
2. 40 CFR 265.16(d)(3)- no documentation of the amount of both introductory and continuing training that will be given to each person in a position related to hazardous waste management.
3. 40 CFR 262.34(a)(2)- failure to have dates of accumulation marked on the drums of hazardous waste.

Information Requested

1. The regulation contained at 40 CFR 265.16(d)(1) states that the owner or operator must maintain the following documents and records at the facility: the job title for each position at the facility related to the hazardous waste management, and the name of the employee filling each job. Please provide a list of job titles and names of each employee filling such specific positions.
2. The regulation contained at 40 CFR 265.16(d)(3) states that the owner or operator must maintain the following documents and records at the facility: a written description of the amount of both introductory and continuing training that will be given to each person in a position related to hazardous waste management. Please provide a written description of the amount of both introductory and continuing training that will be given to each person in a position related to hazardous waste management.
3. The regulation contained at 40 CFR 262.34(a)(2) states that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. Please verify that you have marked all your drums with the accumulation date.

INSTRUCTIONS

- Identify the Person(s) responding to this request on your behalf.
- Address each numbered item separately, and precede each answer with the number of the item to which it responds.
- For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)
- For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.
- For each numbered item, identify all persons consulted in the preparation of the answer.
- For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.
- If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.
- If information that is not known or available at the time you make your response, later becomes known or available to you, you must supplement your response.
- If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify EPA immediately.
- You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."
- ~~EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.~~
- A request for an extension to the time limit for responding must be in writing and must be made within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.
- Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores.
- This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to \$27,500 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Scott Loven
Industrial Laminates/Norplex
665 Lybrand Street
Postville, IA 52162

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) Scott Loven B. Date of Delivery 3-9-01

C. Signature

[Signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

977

3. Service Type

- ☐ Certified Mail
- ☐ Registered
- ☐ Insured Mail
- ☐ Express Mail
- ☐ Return Receipt for Merchandise
- ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number (Copy from service label)

Z 404 814 246

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

Z 404 814 246

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Mr. Scott Loven
Industrial Laminates/Norplex
665 Lybrand Street
Postville, IA 52162

Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995